

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	Criminal No: 4: 20-cr-40036-MRG
)	
VINCENT KIEJZO,)	
Defendant.)	

ASSENTED-TO MOTION TO CONTINUE SENTENCING HEARING

Now comes counsel for Vincent Kiejzo and requests that the sentencing hearing scheduled for April 3, 2024, be continued to a date approximately 2-4 weeks from that date, on a date convenient to the court and the parties. Counsel conferred with the government and understands that Assistant United States Attorney Kristen Noto assents to this motion. Should the court grant this request, both parties would be available for a rescheduled sentencing hearing on April 17, 22, 24, 26 (a.m. only), 29, and May 1, 2 or 3, 2024.

As grounds, undersigned counsel states that the government has provided several requests for restitution in this case, and counsel is in the process of reviewing them and conferring with victims' counsel. To adequately prepare for sentencing, and to address and resolve any potential disputes regarding restitution in advance of sentencing, undersigned counsel submits that a continuance as requested herein will permit undersigned counsel sufficient time to review the materials and confer with victims' counsel. Counsel further submits that the restitution requests, and the potential resolution of the requests, will enable the parties to better prepare for sentencing and craft their respective sentencing recommendations, including with respect to whether statutory fines are appropriate based on Mr. Kiejzo's ability to pay and anticipated restitution obligations.

Wherefore, undersigned counsel, with the assent of the government, requests that the currently scheduled sentencing be continued to a date in approximately 2-4 weeks.

DATED: 3/27/24

VINCENT KIEJZO

By his attorney,

/s/ Sandra Gant

Sandra Gant, MA BBO # 680122

Federal Defender Office

51 Sleeper Street, 5th Floor

Boston, MA 02210

617-223-8061

CERTIFICATE OF SERVICE

I, Sandra Gant, hereby certify that this document filed through email and the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on March 27, 2024.

/s/ Sandra Gant

Sandra Gant